

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

UNITED STATES OF AMERICA,	:	Civil No. 1:25CV399
Plaintiff,	:	
	:	
v.	:	
	:	
242,406.102 USDT in funds from Tether Ltd.	:	
virtual currency address ending in F544,	:	
	:	
235,680.00 USDT in funds from Tether Ltd.	:	
virtual currency address ending in 5ad0,	:	
	:	
223,743.002 USDT in funds from Tether Ltd.	:	
virtual currency address ending in 48D4,	:	
	:	
and	:	
	:	
220,000.00 USDT in funds from Tether Ltd.	:	
virtual currency address ending in 6cfC,	:	
Defendants.	:	

**VERIFIED COMPLAINT OF FORFEITURE**

NOW COMES Plaintiff, the United States of America, by and through Randall S. Galyon, Acting United States Attorney for the Middle District of North Carolina, and respectfully states as follows:

1. This is a civil action in rem brought to enforce the provisions of Title 18, United States Code, Section 981(a)(1)(A) for the forfeiture of property which was involved in transactions or attempted transactions in violation of Title 18, United States Code, Sections 1956, 1957, or 1960, or is traceable to such property.

2. This action is also brought to enforce the provisions of Title 18, United States

Code, Section 981(a)(1)(C) for the forfeiture of property which constitutes or was derived from proceeds traceable to an offense constituting specific unlawful activity as defined in Title 18, United States Code, Section 1956, or a conspiracy to commit such offense, specifically a violation of Title 18, United States Code, Section 1343 (wire fraud), and/or Title 18, United States Code, Section 1349 (conspiracy to commit wire fraud).

3. The “defendant properties” are as follows:

- a. 242,406.102 USDT in funds from Tether Ltd. virtual currency address ending in F544;
- b. 235,680.00 USDT in funds from Tether Ltd. virtual currency address ending in 5ad0;
- c. 223,743.002 USDT in funds from Tether Ltd. virtual currency address ending in 48D4; and
- d. 220,000.00 USDT in funds from Tether Ltd. virtual currency address ending in 6cfC.

4. On or about December 19, 2024, virtual currency in the Tether Ltd. Virtual currency addresses described above was seized pursuant to the execution of a seizure warrant (1:24MJ563). On or about April 4, 2025, Tether reissued equivalent amounts of USDT to a virtual currency wallet address controlled by the United States Marshals Service (USMS). The defendant properties are currently being held pending forfeiture in the USMS-controlled wallet address.

5. Plaintiff brings this action in rem in its own right to forfeit and condemn the

defendant properties. This Court has jurisdiction over an action commenced by the United States under 28 U.S.C. § 1345, and over an action for forfeiture under 28 U.S.C. § 1355(a).

6. This Court has in rem jurisdiction over the defendant properties under 28 U.S.C. § 1355(b). Upon the filing of this complaint, Plaintiff requests that the Court issue an arrest warrant in rem pursuant to Supplemental Rule G(3)(b), which Plaintiff will execute upon the properties pursuant to 28 U.S.C. § 1355(d) and Supplemental Rule G(3)(c).

7. Venue is proper in this district pursuant to 28 U.S.C. §§ 1355(b)(1) and 1395, because the defendant properties were seized while located in the jurisdiction of this Court, or one or more of the acts giving rise to forfeiture occurred in this district.

8. The facts and circumstances supporting the seizure and forfeiture of the defendant properties are contained in Exhibit A, attached hereto and wholly incorporated herein by reference.

WHEREFORE, the United States of America prays that process for a Warrant for Arrest and Notice In Rem be issued for the arrest of the defendant properties; that due notice be given to all parties to appear and show cause why the forfeiture should not be decreed; that judgment be entered declaring the defendant properties forfeited to the United States of America for disposition according to law; and that the United States of America be granted such other relief as this Court may deem just and proper, together with the costs and disbursements of this action.

This the 20<sup>th</sup> day of May, 2025.

Respectfully submitted,

RANDALL S. GALYON  
Acting United States Attorney

/s/ Lynne P. Klauer

Lynne P. Klauer

Assistant United States Attorney

NCSB #13815

101 S. Edgeworth Street, 4th Floor

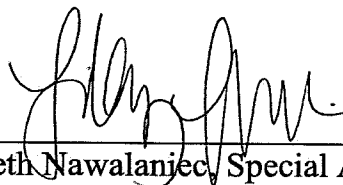
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## VERIFICATION

Pursuant to 28 U.S.C. § 1746, I verify under penalty of perjury under the laws of the United States of America, that the contents of the foregoing Verified Complaint of Forfeiture are true and correct to the best of my knowledge, information and belief.

A handwritten signature in black ink, appearing to read 'Elizabeth Nawalanjec', is written over a horizontal line.

Elizabeth Nawalanjec, Special Agent  
Federal Bureau of Investigations